

**Brett R. Schwartz, Esq.**  
**(BRS-5370)**  
**LEBENSFELD SHARON & SCHWARTZ P.C.**  
**140 Broad Street**  
**Red Bank, New Jersey 07701**  
**(732) 530-4600**  
**[Brett.schwartz@lsandspc.com](mailto:Brett.schwartz@lsandspc.com)**  
**[Alan.lebensfeld@lsandspc.com](mailto:Alan.lebensfeld@lsandspc.com)**  
*Attorneys for Plaintiffs, Alfieri, LLC and  
Environmental Program Management Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ALFIERI, LLC and ENVIRONMENTAL PROGRAM MANAGEMENT CORPORATION,  Plaintiffs,  v.	CIVIL ACTION  <b>Case Number: 2:17-cv-03593</b>
ZURICH AMERICAN INSURANCE COMPANY, CRC INSURANCE SERVICES, INC., SCOTT C. HANDWERGER and A. LOGAN INSURANCE BROKERAGE, INC.  Defendants.	<b>AFFIDAVIT OF MERIT AS TO DEFENDANT CRC INSURANCE SERVICES, INC.</b>

I, **RICHARD G. PFLUGER**, of full age, being duly sworn and upon my oath, hereby depose and say:

1. I am a licensed insurance producer in New Jersey and have been licensed as a producer of property and casualty coverage for at least five years;
2. I have no financial interest in this case or its outcome.
3. Based upon the records which I have reviewed and/or the facts of this matter, there

is reasonable probability that the care, skill, knowledge and professional services exercised, exhibited or rendered by CRC Insurance Services, Inc. in connection with, among other things,

the procurement and placement of worker's compensation insurance coverage for Alfieri, LLC and Environmental Program Management Corporation and their respective employees, as set forth in the complaint herein, fell outside the acceptable professional or occupational standards, practices or requirements of an insurance agent/broker/producer.

I declare under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements are willfully false, I may be subject to punishment.

## NOTICE

If any defendant has any objection to the sufficiency of this Affidavit of Merit, demand is hereby made that the defendant immediately notify plaintiffs of any such alleged deficiencies so that same may be corrected if necessary.

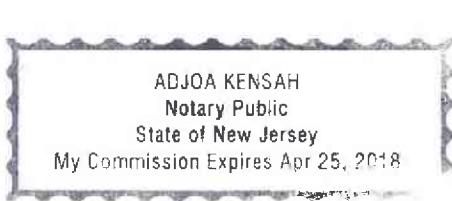
Dated: July 26, 2017

Richard G. Pfluger

**I CERTIFY** that on July 26, 2017,

**Richard G. Pfluger**, personally came before me and acknowledged to me under oath, to my satisfaction, that this person:

- (a) Is named in, and personally signed, this document; and
- (b) Signed, sealed and delivered this document as his voluntary act and deed.



---

A Notary Public of the State of New Jersey